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PLEASE REPLY TO WEST ORANGE

January 24, 2008

Via Electronic Case Filing

Hon. Richard J. Sullivan, U.S.D.J.
 United States Courthouse
 500 Pearl Street - Room 615
 New York, NY 10007

**Re: Greenwich Insurance Co. v. United States of America
 Civil Case No. 07-7321 (RJS) (RLE)**

Dear Judge Sullivan:

We represent Greenwich Insurance Company, the plaintiff in the above-referenced matter, which is an action to set aside certain levies filed by the Internal Revenue Service against non-party taxpayer NAP Construction Co., Inc.

In accordance with your Rules, please accept this letter as Greenwich's request for a pre-motion conference so that Greenwich may seek leave to file an Amended Complaint. The proposed pleading has already been reviewed by counsel for the Government, who has consented to Greenwich's filing same. The proposed amended pleading does not alter any theories in the case, or impact the discovery schedule as discovery has not yet commenced. An initial conference is scheduled to be held before you on February 15, 2008.

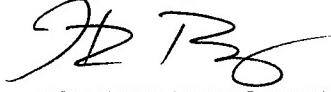
WOLFF & SAMSON PC

Hon. Richard J. Sullivan, U.S.D.J.
January 24, 2008
Page 2

In light of the foregoing, if acceptable to you, we respectfully request that you endorse this letter as So Ordered so that we may file an Amended Complaint, without the need for a formal pre-motion conference, in advance of the initial conference.

Thank you for your attention to the foregoing. Should you wish to have a formal pre-motion conference, or address this request at the initial conference, please let me know.

Respectfully,



JONATHAN BONDY

JB/oc

cc: Li Yu, Esq. (via e-mail & regular mail)